

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

BRADLEY ERHART,)	
)	
Plaintiff,)	
)	
v.)	No. 1:21-cv-01829-TAB-TWP
)	
NANCY ERHART,)	
)	
Defendant.)	

RENEWED UNOPPOSED MOTION FOR EXTENSION OF DEADLINE

COMES NOW Defendant, Nancy Erhart, by counsel and for her renewed unopposed motion for extension of deadline would state:

1. The deadline to file dispositive motions is currently August 10, 2022.
2. On July 5, 2022, Defendant filed an Unopposed Motion for Extension of Deadlines requesting that the deadline to complete discovery be extended to October 4, 2022 and the deadline to complete dispositive motions be extended to November 4, 2022, so that such deadline coincided with the discovery extension.
3. On July 7, 2022, this Court granted the Unopposed Motion in part and extended the discovery deadline but denied the extension of the deadline to file dispositive motions.
4. The Court found that the appearance of additional counsel alone does not provide good cause for the requested relief, particularly because the relief requested may impact the current trial date.
5. Good cause exists for extending the deadline to file dispositive motions.
6. Undersigned counsel is replacing former counsel for defendant. Attorney Smith agreed to stay on the case only long enough to assist with a smooth transition and intends to

withdraw in short order.

7. Discovery necessary for dispositive motions will not be complete in time to draft and file dispositive motions on August 10, 2022.

8. In addition, extending the deadline to file dispositive motions will allow additional time for the parties to engage in settlement negotiations.

9. In the event that dispositive motions are filed on or before November 4, 2022, responses due thirty days thereafter, and replies fifteen days thereafter, the briefing of dispositive motions will be complete by December 20, 2022. Therefore, extending the deadline should not disrupt the trial date currently scheduled for February 15, 2023.

10. Notwithstanding the foregoing, in the event that the Court were to extend the deadline until October 14, 2022 (ten days following the completion of discovery), briefing on dispositive motions should be completed by November 29, 2022. Leaving two and a half (2 ½) months prior to the trial date.

11. At a minimum, extending the deadline for dispositive motions by thirty (30) days, up to and including September 9, 2022, should in no event impact the trial date.

12. Plaintiff does not object to the requested extension.

13. Defendant respectfully renews her request that the Court extend the deadline to file dispositive motions, and requests that the Court extend the deadline to a date that will not impact the current trial date

14. That this motion is not being filed for hindrance or delay.

WHEREFORE, Defendant requests that this Court extend the deadline to file dispositive motions, and for all other proper relief.

Respectfully Submitted,

EMSWILLER, WILLIAMS, NOLAND
& CLARKE, LLC

By: /s/ *Paul R. Sadler*_____

Paul R. Sadler, Counsel to Respondent
Emswiler, Williams, Noland & Clarke, LLC
8500 Keystone Crossing, Suite 500
Indianapolis, IN 46240
psadler@ewnc-law.com
(317) 257-8787

CERTIFICATE OF SERVICE

I, Paul R. Sadler, an attorney, hereby certified that a true and correct copy of the above and foregoing document was electronically filed on July 8, 2022, with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties and attorneys of record.

/s/ *Paul R. Sadler*_____

Paul R. Sadler